## BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

## **DOCKET NO. 2017-8-E**

IN THE MATTER OF:	)	
	)	PETITION TO INTERVENE
Duke Energy Progress, LLC's	)	BY NUCOR STEEL -
Integrated Resource Plan (IRP)	)	SOUTH CAROLINA
	)	

Nucor Steel-South Carolina ("Nucor"), a Division of Nucor Corporation, pursuant to Rule 103-825 of the rules and regulations of the South Carolina Public Service Commission ("Commission"), hereby respectfully petitions to intervene in the above-captioned docket. Nucor states the following grounds in support of this petition:

- 1. Nucor owns and operates a steel production facility near Darlington, South Carolina. As a retail customer of Duke Energy Progress, LLC ("DEP") (formerly known as Progress Energy Carolinas, Inc. ("PEC") and Carolina Power & Light Company ("CP&L")), Nucor purchases hundreds of millions of kWh of electricity annually at a cost of millions of dollars a year. Since the cost of electricity comprises one of the major costs of Nucor's manufacturing process, electric costs directly affect Nucor's ability to continue to produce steel at a competitive price.
- 2. This docket has been established to review DEP's 2017 Integrated Resource Plan ("IRP") which "details potential infrastructure needed to match the forecasted electricity requirements and a reasonable reserve margin to maintain system reliability for our customers over the next 15 years." IRP at 6. In Order No. 2012-95, the Commission determined that the IRP process constitutes a proceeding under Section 103-804(Q) of the Commission's regulations, and that intervention in these proceedings would be permitted.

- 3. As a large industrial customer of DEP, Nucor has an interest in the topics addressed in the IRP, including DEP's current long-term energy and demand forecasts and DEP's plans to meet its future resource needs. Accordingly, Nucor has a stake in, and will be directly and substantially affected by, the outcome of this proceeding. Due to the magnitude of its load and its unique service characteristics, Nucor cannot be adequately represented by any other party to this proceeding. Since 1987, Nucor has actively participated in many previous DEP, PEC and CP&L fuel and rate proceedings before this Commission. Nucor has not yet determined what its position may be in this proceeding.
- 4. Nucor's mailing address is:

Nucor Steel – South Carolina P.O. Box 525 Darlington, SC 29532

5. Nucor will be represented in this proceeding by the firm Moore & Van Allen, PLLC. Service and correspondence regarding this proceeding should be sent to the undersigned.

WHEREFORE, for the reasons set forth above, Nucor respectfully requests permission to intervene in this proceeding.

Respectfully submitted,

MOORE & VAN ALLEN, PLLC

Robert R. Smith, II

100 North Tryon Street
Suite 4700
Charlotte, North Carolina 28202
(704) 331-1091
(704) 339-5870 (Fax)
robsmith@mvalaw.com

Dated: November 30, 2017

## BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

## **DOCKET NO. 2017-8-E**

N THE MATTER OF:	)	
	)	
Duke Energy Progress, LLC's	)	CERTIFICATE OF SERVICE
ntegrated Resource Plan (IRP)	)	
	)	

This is to certify that the foregoing document was served upon the following parties at the addresses set forth by first-class mail, fax or electronic mail on this the 30<sup>th</sup> day of November, 2017:

Jeffrey M. Nelson, Esq.
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, South Carolina 29201
inelson@regstaff.sc.gov

Rebecca J. Dulin, Esq.
Duke Energy Progress, LLC
1201 Main Street, Suite 1180
Columbia, SC 29201
Rebecca.Dulin@duke-energy.com

Elizabeth Jones, Esq.
Southern Environmental Law Center
463 King Street, Suite B
Charleston, SC 29403
ejones@selcsc.org

Heather Shirley Smith, Esq.
Duke Energy Progress, LLC.
40 W. Broad St. Suite 690
Greenville, SC 29601
Heather.smith@duke-energy.com

Frank R. Ellerbe, III, Esq.
Sowell Gray Robinson Stepp Laffitte, LLC
Post Office Box 11449
Columbia, SC 29211
fellerbe@sowellgray.com

Robert R. Smith, II